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VIA ECF

May 1, 2020

Re: *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,  
Case No. 1:16-cv-08778-LGS [rel. 1:12-cv-03040-KBF]

The Honorable Lorna G. Schofield  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Dear Judge Schofield:

Pursuant to Rules I.B.1 and I.D.3 of this Court's Individual Rules and Procedures for Civil Cases, we write on behalf of Plaintiffs The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers") to respectfully request that the Court issue an order authorizing the filing of Travelers' response (the "Response Letter") to Defendants Northrop Grumman Corporation's and Northrop Grumman Systems Corporation's ("Grumman") pre-motion letter regarding Grumman's proposed motion as to the duty to defend the *Romano* lawsuit (ECF 318) in redacted form on the docket and under seal. Travelers seeks to redact the portions of its Response Letter that reproduce or paraphrase information contained in a recent letter that Grumman filed under seal pursuant to an order of the Court.

Specifically, on April 16, 2020, Grumman submitted its response to Travelers' pre-motion letter regarding Travelers' proposed pollution exclusion motion, along with a request to file its response under seal and in redacted form. ECF 320. On April 21, 2020, the Court granted Grumman's sealing request, finding that "[t]he proposed redactions and sealed filing are narrowly tailored and necessary to prevent unauthorized dissemination of confidential or prejudicial business information." *See* ECF 323. The information in the Response Letter that Travelers seeks to redact and file under seal reproduces or paraphrases certain information contained in Grumman's April 16, 2020 filing that is filed under seal pursuant to this Court's April 21, 2020 order.

In accordance with the Court's Individual Rules and Procedures for Civil Cases, Travelers will separately file: (1) a redacted version of Travelers' Response Letter on the public

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docket; and (2) an unredacted version of Travelers' Response Letter, with proposed redactions in yellow highlighting, under seal. Travelers is also enclosing an appendix that identifies all attorneys of record who should have access to the sealed documents.

Respectfully submitted,

/s/ Mary Beth Forshaw

Mary Beth Forshaw

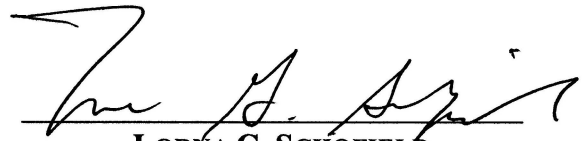
Lynn K. Neuner

cc: All Counsel of Record

Application GRANTED. The letter filed under seal at Dkt. No. 327 shall remain under seal and accessible only to the attorneys identified by Travelers in the appendix to its letter motion at Dkt. No. 326. The proposed redactions and sealed filing seek to protect information already subject to the Sealing Order at Dkt. No. 323.

The Clerk of Court is respectfully directed to close Dkt. No. 326.

Dated: May 4, 2020  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

**APPENDIX:**

**All Attorneys of Record Who Should Have Access to  
Travelers' Sealed Response to Grumman's Pre-Motion Letter**

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